LAW OFFICES OF DONALD H. HOWE, LLC 818 WAPPOO ROAD P.O. BOX 31324 CHARLESTON, SC 29417 PHONE: (843) 225-2523 FAX: (843) 225-2698

FAX COVER SHEET

DATE:

January 9, 2019

DELIVER TO:

Honorable Jocelyn Boyd
Chief Clerk/Administrator

The Public Service Commission

State of South Carolina

RECEIVED

JAN 09 2019

FAX NUMBER:

803-896-5199

PSC SC CLERK'S OFFICE

FROM:

Donald H. Howe

OPERATOR:

Greta B. Howe

RE:

Docket No. 2018-212-W - Colleen Walz, Chief of St. John's

Fire District, Complainant/Petitioner v. Kiawah Island

Utility, Inc., Defendant/Respondent

NO. OF PAGES:

5, including the cover sheet.

COMMENTS:

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LAW OFFICES OF DONALD H. HOWE, LLC

Attorneys at Law

January 9, 2019



BY FAX AND U.S.MAIL

Honorable Jocelyn Boyd
Chief Clerk/Administrator
The Public Service Commission
State of South Carolina
101 Executive Center Drive
Suite 100
Columbia, SC 29210-8411

RE:

Docket No. 2018-212-W - Colleen Walz, Chief of St. John's Fire District,

Complainant/Petitioner v. Kiawah Island Utility, Inc., Defendant/Respondent

crule Bowe

Dear Ms. Boyd:

Please find enclosed Petitioner's Motion for Consolidation and Intervention in the above matter along with a certificate of service.

With kindest regards, I am

Sincerely,

Donald H. Howe

DHH/ghb Enclosure

cc:

Chief Colleen Walz Commissioner Eric Britton Commissioner Debra Lehman Charles L. A. Terreni, Esquire Jeffrey M. Nelson, Esquire RECEIVED

JAN 09 2019

PSC SC

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2018-212-W 28/179

10 (F9-1904) []

2018-257-W^S 28 1180

Colleen Walz, Chief of St. John's Fire District, Complainant/Petitioner v. Kiawah Island Utility, Incorporated, Defendant/Respondent MOTION FOR CONSOLIDATION AND INTERVENTION

Petitioner, St. John's Fire District, hereby consents to and joins in the Motion to Consolidate filed by Respondent Kiawah Island Utility, Inc. dated December 21, 2018. Petitioner submits that a consolidation of the matters will best serve the efficiency of the Public Service Commission.

If the Motion to Consolidate is granted, Petitioner also seeks to intervene in the rate case (Docket No. 2018-257-WS) presently scheduled for March 28, 2019. As outlined in the Respondent's Motion to Consolidate, the Respondent has no objection to Petitioner's intervention in the pending rate case. Petitioner believes that the Office of Regulatory Staff also has no objection to its Request to Intervene.

For the foregoing reasons, St. John's Fire District requests that the Public Service Commission grant the following relief:

1) Consolidate the Complaint of St. John's Fire District (Docket No. 2018-212-W) with the rate case (Docket No. 2018-257-WS) presently pending before the Commission.



JAN **09** 2019

PSC SC CLERK'S OFFICE

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2) Allow St. John's Fire District to Intervene in the rate case (2018-257-WS) and participate as an Intervenor in the presently pending matter.

Donald H. Howe, Esquire

Attorney for Colleen Walz, Chief

St. John's Fire District

Dated: Jan 9, 201

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2018-212-W

Colleen Walz, Chief of St. John's Fire District, Complainant/Petitioner v. Kiawah Island Utility, Incorporated, Defendant/Respondent

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on the ______ day of January 2019, I served a copy of Motion for Consolidation and Intervention by placing a copy of same in the United States mail and electronic mail addressed to the following:

Charles L. A. Terreni, Esquire Terreni Law Firm, LLC 1508 Lady Street Columbia, SC 29201 charles.terreni@terrenilaw.com

Jeffrey M. Nelson, Esquire Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201 jnelson@regstaff.sc.gov

Donald H. Howe, Esquire

Attorney for Colleen Walz, Chief

St. John's Fire District

Dated: 2019